

AO 91 (Rev. 11/11) Criminal Complaint

**FILED**  
**UNITED STATES DISTRICT COURT**  
**LAS CRUCES, NEW MEXICO**

**UNITED STATES DISTRICT COURT**

for the

District of New Mexico

NOV 09 2023

**MITCHELL R. ELFERS**  
**CLERK OF COURT**

United States of America )

v. )

Jeffery Saint Louis )

Case No. 23-1618 MS

\_\_\_\_\_  
*Defendant(s)*

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 8, 2023 in the county of Otero in the  
Judicial District of New Mexico, the defendant(s) violated:

*Code Section**Offense Description*

Title 21 U.S.C. §§ 841(a)(1), (b)(1)  
 (A):

Possession with intent to distribute methamphetamine.

This criminal complaint is based on these facts:

See attached Affidavit, which is incorporated by reference as if fully set out herein.

☒ Continued on the attached sheet.

David Lambert

Complainant's signature

David Lambert, DEA SA

Printed name and title

Sworn to before me and signed <sup>telephonically</sup> ~~in my presence~~.

Date: 9 Nov 2023

City and state: Las Cruces, New Mexico

Damian L Martinez

Judge's signature

Damian L Martinez U.S. Magistrate Judge

Printed name and title

**United States of America**

**V.**

**Jeffery Saint Louis**

I, David Lambert, Affiant, being duly sworn, state that the following information is true and correct to the best of my knowledge and belief:

1. On November 8, 2023, at approximately 11:54 a.m., a United States Border Patrol (USBP) agent who was assigned to the primary inspection area of the USBP Alamogordo Border Patrol Checkpoint located on Highway 54, Alamogordo, New Mexico, observed a grey 4-door Chevy Cruze bearing Texas plate SMN6916 arrive at the checkpoint, with one visible occupant. The USBP agent observed as the driver, later identified as Jeffery Saint Louis, was holding his identification card and was nervous playing with his nose ring. Saint Louis stated he was going to Alamogordo, but could not provide an address, and then changed his story and said he was going to see relatives in Carlsbad, NM. The USBP agent asked for consent to look in the trunk of the vehicle, to which Saint Louis opened the trunk. Agents observed a suitcase and asked Saint Louis how often Saint Louis came through the checkpoint, to which he stated this was his first time. Agents asked Saint Louis to pull over to the secondary inspection lane, to which he began driving and then fled the checkpoint at a high rate of speed. USBP agents attempted to pull over Saint Louis's vehicle, but he did not yield and continued at a high rate of speed, at which time the agents terminated pursuing the vehicle.
2. Shortly thereafter, Deputies from the Otero County Sheriff's Office (OCSO) observed the grey Chevy Cruze bearing a Texas plate SMN6916 traveling north bound on Highway 54 south driving at a in excess of 100 miles per hour (mph) and attempted to stop the vehicle.

OCSO deputies observed the vehicle turn onto the bypass from Highway 54 south and begin traveling northbound on the southbound lane, going against oncoming traffic. Saint Louis's vehicle then struck an oncoming motorcyclist, fatally killing the motorcyclist. Following the collision, Saint Louis attempted to flee the scene on foot, but deputies were able to detain him.

3. Following the accident, Kyle Graham a criminal investigator with the 12<sup>th</sup> Judicial District Attorney's Office applied for and received a district court search warrant for Saint Louis's vehicle the grey Chevy Cruze bearing a Texas plate SMN6916. At approximately 5:30 p.m., officers executed the search warrant of the vehicle and located what appeared to be bundles consistent with drug trafficking under the spare tire cover of the vehicle. Officers then stopped the search of the vehicle and applied for a second district court warrant which was also signed by district court judge John P. Sugg. Subsequent to the search of the vehicle officers, located 20 bundles of a crystal-like substance weighing approximately 11.3 kilograms. The substance was field tested with a TruNarc device and tested positive for the properties and characteristics of methamphetamine.
4. On the same date, Drug Enforcement Administration (DEA) agents responded to the Alamogordo police station. Saint Louis was advised of his *Miranda* rights which he stated he understood and was willing to speak with agents. Saint Louis admitted to picking up the bundles of methamphetamine in Sunland Park, New Mexico (NM). Saint Louis stated he knew he was picking up narcotics and was going to be paid \$4,000 to deliver the bundles to Carlsbad, NM. Saint Louis admitted that he fled from the USBP checkpoint because he knew the drugs were in the back of the vehicle.

5. Based on my knowledge, experience, training, and facts set forth above, I believe that on November 8, 2023, Jeffery Saint Louis possessed with intent to distribute methamphetamine in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A).

David Lambert

David Lambert, Special Agent  
Drug Enforcement Administration

Electronically submitted and telephonically  
Sworn to before me on this 9<sup>th</sup> day of November,  
2023.

Damian L Martinez

Damian L Martinez  
United States Magistrate Judge